

W/21/2007

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

THOMAS WILNER, et al.

Plaintiffs,

v.

NATIONAL SECURITY AGENCY and
DEPARTMENT OF JUSTICE

Defendants.

Judge Denise L. Cote

No. 07-CIV-3883

**MOTION TO ADMIT COUNSEL
PRO HAC VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Shayana Kadidal, a member of good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of the following attorneys:

James I. Rubin
Butler Rubin Saltarelli & Boyd LLP
70 West Madison Suite 1800
Chicago, Illinois 60602
(312) 444-9660
(312) 444-1715 (facsimile)
jrubin@butlerrubin.com

Julie P. Shelton
Butler Rubin Saltarelli & Boyd LLP
70 West Madison Suite 1800
Chicago, Illinois 60602
(312) 444-9660
(312) 444-9843 (facsimile)
jshelton@butlerrubin.com

Karen M. Borg
Butler Rubin Saltarelli & Boyd LLP
70 West Madison Suite 1800
Chicago, Illinois 60602
(312) 444-9660
(312) 444-9843 (facsimile)
kborg@butlerrubin.com

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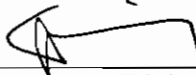
Mark A. Schwartz
Butler Rubin Saltarelli & Boyd LLP
70 West Madison Suite 1800
Chicago, Illinois 60602
(312) 444-9660
(312) 444-9702 (facsimile)
mschwartz@butlerrubin.com

James I. Rubin, Julie P. Shelton, Karen M. Borg, and Mark A. Schwartz all are members in good standing of the Bar of the State of Illinois and of the United States District Court for the Northern District of Illinois. Ms. Shelton is also a member in good standing of the Bar of the United States District Court for the Eastern District of Wisconsin.

There are no pending disciplinary proceedings against James I. Rubin, Julie P. Shelton, Karen M. Borg, or Mark A. Schwartz in any State or Federal Court.

Dated: November 20, 2007
New York, New York

Respectfully submitted,


Shayana Kadidal [SK-1278]
CENTER FOR CONSTITUTIONAL RIGHTS
666 Broadway, 7th Floor
New York, NY 10012
Phone: (212) 614-6438
Fax: (212) 614-6499

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

THOMAS WILNER, et al.

Plaintiffs,

v.

NATIONAL SECURITY AGENCY and
DEPARTMENT OF JUSTICE

Defendants.

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)
) Judge Denise L. Cote
)
)

No. 07-CIV-3883

)
) **AFFIRMATION OF**
) **SHAYANA KADIDAL**
) **IN SUPPORT OF MOTION**
) **TO ADMIT COUNSEL**
) **PRO HAC VICE**
)

Shayana Kadidal, being duly sworn, hereby affirms as follows:

1. I am Senior Managing Attorney at the Center for Constitutional Rights and counsel for Plaintiffs in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiffs' motion to admit James I. Rubin, Julie P. Shelton, Karen M. Borg, and Mark A. Schwartz as counsel *pro hac vice* to represent Plaintiffs in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law on July 24, 1996. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. James I. Rubin, Julie P. Shelton, Karen M. Borg, and Mark A. Schwartz are attorneys with the law firm of Butler Rubin Saltarelli & Boyd LLP in Chicago, Illinois.

4. I have known Ms. Shelton and Mr. Rubin since August of 2006, and Mr. Schwartz and Ms. Borg since earlier this year.

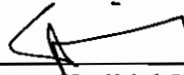
5. I have found Mr. Rubin, Ms. Shelton, Ms. Borg, and Mr. Schwartz to be skilled attorneys and persons of integrity. They are all experienced in federal practice and familiar with the Federal Rules of Procedure.

6. Accordingly, I am pleased to move their admission, *pro hac vice*.

7. I respectfully submit a proposed order granting the admission of James I. Rubin, Julie P. Shelton, Karen M. Borg, and Mark A. Schwartz, *pro hac vice*, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit James I. Rubin, Julie P. Shelton, Karen M. Borg, and Mark A. Schwartz, *pro hac vice*, to represent Plaintiffs in the above captioned matter, be granted.

Respectfully submitted,



Shayana Kadidal [SK-1278]

CENTER FOR CONSTITUTIONAL RIGHTS

666 Broadway, 7th Floor

New York NY 10012

Phone: (212) 614-6438

Fax: (212) 614-6499

Dated: November 20, 2007

New York, New York

Exhibit A
Proposed Order

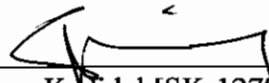
11/21/2007

Certificate of Service

I, Shayana Kadidal, certify that on this date, I caused the foregoing Motion, together with an Affirmation in Support and Proposed Order, to be delivered to the Admissions Clerk of the Court for filing and served on opposing counsel at the following address by overnight delivery:

Rupa Bhattacharyya
Senior Trial Counsel
Federal Programs Branch, Civil Division
United States Department of Justice
P.O. Box 883, 20 Massachusetts Ave., N.W.
Washington, D.C. 20044
Tel: (202) 514-3146

Dated: November 20, 2007



Shayana Kadidal [SK-1278]
CENTER FOR CONSTITUTIONAL RIGHTS
666 Broadway, 7th Floor
New York, NY 10012-2317
Ph: (212) 614-6438
Fax: (212) 614-6499

CERTIFICATE OF GOOD STANDING



United States of America

}ss. Karen Minkoff Borg

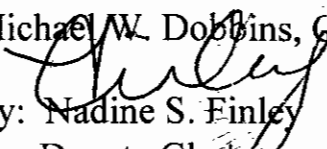
Northern District of Illinois

I, Michael W. Dobbins, Clerk of the United States District Court
for the Northern District of Illinois,

DO HEREBY CERTIFY That Karen Minkoff Borg
was duly admitted to practice in said Court on (12/20/1995)
and is in good standing as a member of the bar of said court.

Dated at Chicago, Illinois
on (11/06/2007)

Michael W. Dobbins, Clerk,

By: 
Nadine S. Finley
Deputy Clerk

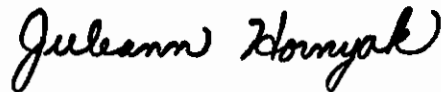
Certificate of Admission To the Bar of Illinois

I, Juleann Hornyak, Clerk of the Supreme Court of Illinois, do hereby certify that

Karen Minkoff Borg

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on November 9, 1995 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto
placed my hand and affixed the seal
of said Supreme Court, at Springfield,
in said State, this Thursday, November 08, 2007.

A handwritten signature in black ink, reading "Juleann Hornyak". The signature is written in a cursive, flowing style.

Clerk

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

THOMAS WILNER, et al.

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Plaintiffs,)
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)

v.)
)
)

NATIONAL SECURITY AGENCY and)
DEPARTMENT OF JUSTICE)
)
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Defendants.)
_____)

Judge Denise L. Cote

No. 07-CIV-3883

**ORDER FOR ADMISSION
PRO HAC VICE
ON WRITTEN MOTION**

Upon the motion of Shayana Kadidal, attorney for Plaintiffs, and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that the following attorneys:

James I. Rubin
Butler Rubin Saltarelli & Boyd LLP
70 West Madison Suite 1800
Chicago, Illinois 60602
(312) 444-9660
(312)444-1715 (facsimile)
jrubin@butlerrubin.com

Julie Shelton
Butler Rubin Saltarelli & Boyd LLP
70 West Madison Suite 1800
Chicago, Illinois 60602
(312) 444-9660
(312) 444-9843 (facsimile)
jshelton@butlerrubin.com

Karen Borg
Butler Rubin Saltarelli & Boyd LLP
70 West Madison Suite 1800
Chicago, Illinois 60602
(312) 444-9660
(312) 444-9843 (facsimile)
kborg@butlerrubin.com

Mark A. Schwartz
Butler Rubin Saltarelli & Boyd LLP
70 West Madison Street, Suite 1800
Chicago, Illinois 60602
(312) 444-9660 (Phone)
(312) 444-9702 (Facsimile)
Email: mschwartz@butlerrubin.com

are admitted to practice *pro hac vice* as counsel for Plaintiffs in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Hon. Denise L. Cote
United States District Judge

Dated: _____
New York, New York

CERTIFICATE OF GOOD STANDING



United States of America

}ss. James I. Rubin

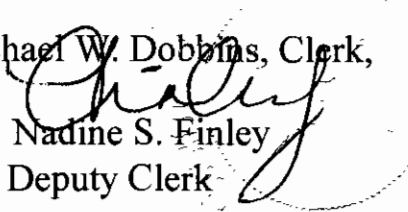
Northern District of Illinois

I, Michael W. Dobbins, Clerk of the United States District Court
for the Northern District of Illinois,

DO HEREBY CERTIFY That James I. Rubin
was duly admitted to practice in said Court on (01/16/1973)
and is in good standing as a member of the bar of said court.

Dated at Chicago, Illinois
on (11/06/2007)

Michael W. Dobbins, Clerk,

By: 
Deputy Clerk

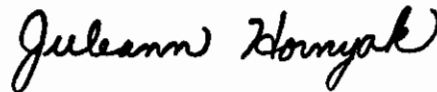
Certificate of Admission To the Bar of Illinois

I, Juleann Hornyak, Clerk of the Supreme Court of Illinois, do hereby certify that

James I. Rubin

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on May 18, 1971 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto
placed my hand and affixed the seal
of said Supreme Court, at Springfield,
in said State, this Thursday, November 08, 2007.

A handwritten signature in black ink, reading "Juleann Hornyak". The signature is written in a cursive, flowing style.

Clerk

CERTIFICATE OF GOOD STANDING



United States of America

}ss. Julie P. Shelton

Northern District of Illinois

I, Michael W. Dobbins, Clerk of the United States District Court
for the Northern District of Illinois,

DO HEREBY CERTIFY That Julie P. Shelton
was duly admitted to practice in said Court on (12/16/1982)
and is in good standing as a member of the bar of said court.

Dated at Chicago, Illinois
on (11/06/2007)

Michael W. Dobbins, Clerk,

By: Nadine S. Finley
Deputy Clerk

A handwritten signature in black ink, appearing to read "Nadine S. Finley", written over the printed name of the Deputy Clerk.

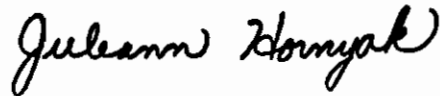
Certificate of Admission To the Bar of Illinois

I, Juleann Hornyak, Clerk of the Supreme Court of Illinois, do hereby certify that

Julie Page Shelton

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on November 1, 1982 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto
placed my hand and affixed the seal
of said Supreme Court, at Springfield,
in said State, this Thursday, November 08, 2007.

A handwritten signature in black ink, reading "Juleann Hornyak". The signature is written in a cursive, flowing style.

Clerk

CERTIFICATE OF GOOD STANDING



United States of America

}ss. Mark A Schwartz

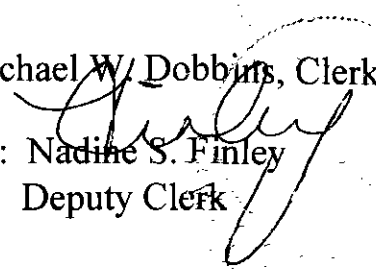
Northern District of Illinois

I, Michael W. Dobbins, Clerk of the United States District Court
for the Northern District of Illinois,

DO HEREBY CERTIFY That Mark A Schwartz
was duly admitted to practice in said Court on (12/16/1999)
and is in good standing as a member of the bar of said court.

Dated at Chicago, Illinois
on (11/06/2007)

Michael W. Dobbins, Clerk,

By: 
Nadine S. Finley
Deputy Clerk

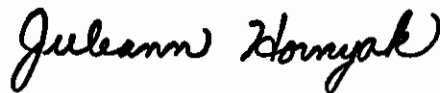
Certificate of Admission To the Bar of Illinois

I, Juleann Hornyak, Clerk of the Supreme Court of Illinois, do hereby certify that

Mark Aaron Schwartz

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on November 4, 1999 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto
placed my hand and affixed the seal
of said Supreme Court, at Springfield,
in said State, this Thursday, November 08, 2007.



Clerk